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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS
Sub-Committee of Experts on the
Transport of Dangerous Goods
(Fourteenth session,
Geneva, 8-18 December 1997,
agenda item 2 (d))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Other draft amendments

Limited Quantities
Chapter 3.4. : 3.4.3. Shrink-wrapped or stretch-wrapped trays

**Transmitted by the European Aerosol Federation (FEA)
and the European Confederation of Paint, Printing Ink
and Artists Colours Manufacturers' Associations (CEPE)**

1 The recommendation in this paragraph concerning limited quantities of dangerous goods in shrink-wrapped or stretch-wrapped packaging (previously paragraph 15.3.2 in Chapter 15) was adopted by the Committee in December 1990 from a proposal made by the expert from the United Kingdom in document ST/SG/AC.10/C.3/R.110. The proposal had been based on the successful results from a series of tests of shrink-wrapped and stretch-wrapped aerosols undertaken by that industry in Europe. These tests had never included any form of tray with the wrapping.

2. In order to make provision at that time for limited quantities of dangerous goods in all kinds of inner packagings, including "fragile" inner packaging, the United Kingdom had suggested that the outer shrink-wrapping or stretch-wrapping should also include a "tray". The sole purpose of this extra stipulation was that a typical corrugated fibreboard tray would act as a shock absorber for fragile inner packagings in the event of impact during normal conditions of transport.

3. During its twelfth session in July 1996, the Sub-Committee agreed to a proposal from the expert from the United States (document ST/SG/AC.10/C.3/R.740) that this recommendation should no longer cover fragile inner packagings. The expert from the United Kingdom therefore further proposed to the Committee in December 1996 (document ST/SG/AC.10/R.518) that provision for the inclusion of "trays" was no longer needed.

4. The principal reason for that last proposal was the growing worldwide pressures both to limit the amount of packaging waste and to recycle as much of such waste as possible. Limited quantities of dangerous goods in shrink-wrapped or stretch-wrapped trays involve two components of packaging material, usually plastics sheet and fibreboard. It must be recognized that this double problem means significantly increased costs in sorting the resultant waste packaging for disposal or recycling.
But these increased costs are unnecessary now that inner packagings within shrink-wrapping or stretch-wrapping cannot be fragile, and there is now no additional safety benefit in transport to justify such costs.

5. During the brief Committee discussion of the United Kingdom proposal in December 1996, several experts said they felt that transport safety would be compromised if some form of tray were no longer to be required (see paragraph 38 of report ST/SG/AC.10/23). Such comments cause dismay and are difficult to understand in the industries faced with the costs of packaging disposal arrangements. Maintaining the tray requirement now offers no additional safety benefit in transport to justify such increased costs.

6. Shrink-wrapping and stretch-wrapping are no different form any other types of outer packaging where the total gross mass of the limited quantity does not exceed 20kg. Such packagings must still meet the full range of the general provisions for the packing of dangerous goods set out in Part 4 of the Recommendations, paragraphs 4.1.1.1., 4.1.1.2. and 4.1.1.4. to 4.1.1.8. , as well as all the other provisions of Chapter 3.4.

7. FEA and CEPE now bring to the Sub-Committee the successful results from recent testing undertaken to provide supporting data for a new proposal concerning "trays". Full technical details from these tests will be provided in a supplementary "INF" paper to this document in time for the Sub-Committee's consideration of the proposal below during its fourteenth session in December1997.

PROPOSAL

In Chapter 3.4., delete reference to "trays" from paragraph 3.4.3 and amend the first sentence to read:

"3.4.3. *Outer packagings of shrink-wrap or stretch-wrap* meeting the conditions of 4.1.1.1., 4.1.1.2. and 4.1.1.4 to 4.1.1.8 are acceptable for articles or inner packagings containing dangerous goods transported in accordance with this Chapter".